

Elizabeth Denham CBE
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

9th September 2019

Dear Elizabeth Denham,

The British Red Cross is the UK's leading voluntary sector emergency response organisation. In 2018, the British Red Cross responded to 1,400 emergencies – one every four hours. We provide emotional and practical support to people impacted by crises ranging from house fires, extreme weather and terror attacks. The British Red Cross is also an auxiliary to Government; we provide direct support to the statutory emergency services; and the British Red Cross is involved in both national and local resilience fora. We use our operational experience and independent research to gather insight and drive the national debate around the future of emergency response in the UK. The Information Commissioners Office consultation on the draft Data Sharing Code of Practice provides an opportunity to share our insights and recommendations on data sharing when preparing for, responding to, and recovery from an emergency.

We welcome that the draft Data Sharing Code of Practice contains a specific section on data sharing in an emergency. However, we have several recommendations to ensure data sharing in an emergency is human centred, meeting the needs of the individuals and communities throughout the emergency pathway.

The British Red Cross recommends that the Data Sharing Code of Practice should encourage statutory authorities to work with voluntary sector responders to build more constructive working relationships and agree new, clear protocols for effective information and data sharing. Our response to the tragic incidents of 2017, which is outlined in our report *Harnessing the Power of Kindness*¹, was hampered by poor data sharing. It is vital that as well as working in close partnership, information is shared appropriately, in order to support people most effectively. We have learned of the importance of proper registration of people affected, or there can be delays in mobilising the right support at the right time, duplication of lists and double counting of people.

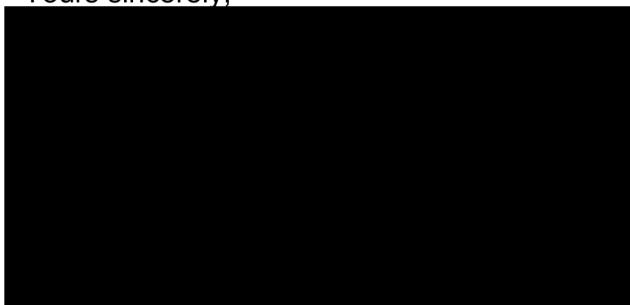
¹ *Harnessing the Power of Kindness* (2018) <https://www.redcross.org.uk/-/media/documents/about-us/research-publications/emergency%20response/harnessing-the-power-of-kindness-for-communities-in-crisis>

There clearly needs to be a strategic recognition of the importance of speedy and effective coordination of community relief efforts and the establishing of well-rehearsed communication channels between recognised responders and the local community and voluntary sector. The fact the voluntary sector is overlooked is demonstrated by the example in the Data Sharing Code of Practice which explores the role of the police, the fire service and local councils, but not the voluntary sector, in planning for identifying and assisting vulnerable people in their area in an emergency. However, our review of Local Resilience Forum plans found that the voluntary sector play a key role in identifying vulnerable individuals, especially identifying those who were considered to be 'unknown'.

The British Red Cross recommends that information and communication should be provided to the public before, during and after an emergency about how their data will be used, and what agencies their details will be shared with – with this requirement being written into Local Resilience Forum plans. In addition, organisations such as those from voluntary and community sector should not be compelled to share details of vulnerable individuals they are working with, to ensure they access the support they need. Though we do recognise it is important for emergency responders to be able to share data, the handling of personal information was a concern outlined in our report *Ready for Anything*, the findings of which were based on a survey of 5,000 members of the public across the UK and a consultation with people directly affected by emergencies.² We found that people need privacy, so need to be reassured that their personal data will be used within the GDPR guidelines. We were also told that the handling of personal data is a concern for people without official status or immigration documents who may fear their status may be passed onto authorities – which may impact them accessing the support they need.

I hope these comments are considered when reviewing the data sharing code of practice. We would welcome a meeting with you or your team to discuss the points raised above, please contact [REDACTED] to arrange a meeting.

Yours sincerely,

A large black rectangular box redacting the signature of the sender.

British Red Cross

² Ready for Anything (2019) <https://www.redcross.org.uk/-/media/documents/about-us/research-publications/emergency-response/british-red-cross-ready-for-anything-report.pdf?la=en&hash=399B57F32D7A2B115CE7184E0FF10AFD91080EBE>